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February 22, 2021

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Please reply to New Jersey

VIA ELECTRONIC FILING

Honorable Zahid N. Quraishi, U.S.M.J.  
 United States District Court, District of New Jersey Trenton  
 Clarkson S. Fisher Federal Bldg. & US Courthouse  
 402 E. State Street, Room 6000  
 Trenton, NJ 08608

RE: **JACKSON TRAILS, LLC VS. TOWNSHIP OF JACKSON, ET AL.**

Our File No. : 88737 BRP  
 Docket No. : 3:20-CV-01150

Dear Judge Quraishi:

This office represents the Defendants in the instant litigation. In our initial conference with the Court the Parties may have advised Your Honor that counsel for both Plaintiffs and Defendants are involved in related litigation in State and Federal Court.

In an effort to streamline the discovery and overall litigation process the Parties are working on creating a universal document production database that would include paper as well as ESI. This has created extra work but all Parties believe will be beneficial in the long run.

This extra work has caused delays and the purpose of this correspondence is to jointly request a sixty (60) day extension of all discovery deadlines. If this is acceptable to Your Honor the Parties will submit a revised discover order.

Respectfully submitted,  
**METHFESSEL & WERBEL, ESQS.**

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